



386955

946819

**Catherine Glorious' Responses to U.S. EPA's
Written Inquiries pursuant to
Section 104(e) of CERCLA**

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

The following individuals were consulted for the following types of information:

1. Catherine Glorious -

Catherine Glorious bought the Jefferson Processing property at a Sheriff's sale in 1994. Thereafter, she began to sell slag and attempted to sale lime and other aggregates from the property that were generated by operations predating her ownership and operation of the

NON-RESPONSIVE

- 2.

NON-RESPONSIVE

3. Gary Smith -

Gary Smith is Catherine Glorious' son-in-law. Mr. Smith is President of Argo Sales, Inc. Argo Sales, Inc. was, and is, a third party contractor to Catherine Glorious, providing her with labor and equipment as needed to oversee Jefferson Processing. Mr. Smith also resides at:

NON-RESPONSIVE

Mr. Smith has no involvement in a personal capacity at the Site.

4. Mike Swickard -

Mike Swickard began working under the direction of Catherine Glorious in February, 1995. He has worked at the site regularly fulfilling Catherine's direction and goal for the property. He has also been instrumental in protecting the transformers and capacitors from vandalism, and a resulting release of PCBs to the environment. Mr. Swickard resides at:

NON-RESPONSIVE

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

Copies of documents in the immediate possession of Mrs. Glorious' legal counsel and referred to in these responses are copied and included with these responses. Other documents likely exist at the site. However, the site's office has been the subject of vandalism and some records have been taken. The remaining records, to the extent that they are responsive, will be provided to the U.S. EPA as a supplement to this response. Other documents responsive to U.S. EPA's requests may be found in the possession of U.S. EPA itself at its various offices (Westlake and Chicago) and the Ohio EPA central office in Columbus, and the Ohio EPA's southeast district office in Logan, Ohio.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Persons who may be able to provide a more detailed or complete response to any Information Request would include representatives of the entities named in number 4 below, who are largely unknown to Mrs. Glorious or any persons who assisted in framing these responses.

4. Identify the acts or omissions of any persons, other than your employees, contractors or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants at the Site, and damages resulting therefrom.

Although U.S. EPA chooses to define the Site to include 61 acres, the "Site" is approximately 325 acres. The Site consists of three or four earthen terraces

beginning with the first floor of the buildings, up to a second earthen terrace which contained material bins for material brought in by railroad for processing, to a third earthen terrace which contains the railroad spur where material was shipped in and out, to a fourth earthen terrace that contains additional by-products of the previous ferro-alloy production facility and materials owned by the U.S. Defense Logistics Agency and/or Government Services Administration. Each of these levels or earthen terraces (topographical levels) are integrally related to, and associated with, the production that occurred in the buildings on the first level. By-products similar to those readily visible when one enters the Site also exist on the fourth terrace of the Site in the back, high above the facility. In fact, a U.S. EPA contractor reported that a slag pile existed on the top of a hill above the plant operation area that was two miles long and 320 feet high.

Using this broader definition of "Site" -- which more accurately characterizes the historical use of the site and the resulting residual materials present today -- the following entities are hereafter identified as potentially responsible parties who have conducted past operations, or have some relationship to entities that had conducted past operations, at the Site:

Foot Mineral Company	Ferro-alloy Production
Vanadium Corporation	Ferro-alloy Production
Satralloy Incorporated	Ferro-alloy Production
Satra Concentrates, Inc.	Recovery of chrome from slag waste; sale of slag
Ara Oztemel, President Satra Concentrates, Inc. Oneida Drive Greenwich, CT 06830	Recovery of chrome from slag waste
Agop Chalekian Satra Corporation 599 West Putnam Avenue Greenwich, CT 06830	Association with Satra entities
Agop Chalekian Satra Industrial Holding Ltd. 599 West Putnam Avenue Greenwich, CT 06830	Association with Satra entities
Lou DiPaolo, Site Manager Satra Concentrates, Inc. 54579 National Road	Recovery of chrome from slag waste

Martins Ferry, Ohio

U.S. Defense Logistics
Agency
Chicago, IL
or
Ravenna, OH

Storage of 100,000 tons
of chrome ore at property

General Services
Administration

Storage of 100,000 tons
of chrome ore at property

AMAX

AMAX bought Vanadium
Corporation

Phelps Dodge Corporation
Denver, Colorado

Phelps Dodge Corporation
bought AMAX

Michael Leech
Phelps Dodge Corporation
Denver, Colorado
(480) 929-4452

Representative of Phelps
Dodge Corporation

Jefferson County Engineer
Jim Brannigan
Country Road 43
Wintersville, OH
(740) 283-8574

Mixed asphalt/blacktop
at site for subsequent
use on Jefferson County
roads.

Cross Creek Township
P.O. Box 2202
Wintersville, OH 43953
(740) 264-0997

Stored slag on Site.

5. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

Jefferson Processing is a sole proprietorship owned by Catherine Glorious. Revenues and expenses associated with its operation are reflected on schedule C of Mrs. Glorious' 1040. Tax returns for the calendar years 1999 - 1996 are provided. Mrs. Glorious' accountant, who does not have a copy of the 1995 return, will request that the Internal Revenue Service forward the 1995 return to him. Upon its receipt, the return will be forwarded to U.S. EPA.

6. What are your title and position with Jefferson Processing? Describe your duties in this position with Jefferson Processing.

Catherine Glorious is the owner and proprietor of Jefferson Processing. Mrs. Glorious was in charge of the marketing and sale of aggregate. She oversaw the operation of the facility. She directed staff members Frank DiCeasar, Abe Zook, and Mike Swickard. Operations at Jefferson Processing ceased in late

1998 as Catherine became to ill to continue the operation of Jefferson Processing. Since that time, it has been secured and maintained by a sole laborer whose function it is to secure and protect the transformers and capacitors until sale or conveyance of the facility, and provide housekeeping at the facility as previously directed by Catherine.

7. Describe Mr. Smith's responsibilities at the Site from 1994 to present.

Mr. Smith has no responsibilities at the Site -- personally or in his capacity as the President of Argo Sales, Inc. Argo Sales has supplied Catherine Glorious with needed manpower and machinery on an as needed basis. Argo Sales, Inc. and Jefferson Processing are unrelated entities, similar in neither function nor organization. However, had Argo Sales failed to continue to supply manpower to Jefferson Processing, the PCB transformers at the Site would have been vandalized and stripped of precious metals therein long ago, resulting in releases of PCBs to both the aquatic and lithographic environment. Further, the Site has never looked better. And, even given the presence of the transformers and capacitors, the Site, in its current condition, is free from hazards to trespassers.

8. Describe Gary Smith's role in your purchase of the Site.

Gary Smith had no role in the purchase of the Site.

9.

NON-RESPONSIVE

NON- RESPONSIVE